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15  
16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION**

19 DISH NETWORK L.L.C.,

20 Plaintiff,

21 v.

22 JADOO TV, INC. et al.,

23 Defendants.

Case No. 2:18-cv-9768-FMO (KSx)

DISCOVERY MATTER

**DISH NETWORK L.L.C.'S NOTICE  
OF MOTION TO COMPEL  
JADOO TV, INC.'S PRODUCTION  
OF DOCUMENTS**

Date: February 26, 2020

Time: 10:00 AM

Honorable Karen L. Stevenson

Discovery Cut-Off: February 7, 2020

Pre-Trial Conference: August 7, 2020

Trial Date: August 25, 2020

1 TO DEFENDANT JADOO TV, INC. AND ITS ATTORNEY'S OF  
2 RECORD:

3 PLEASE TAKE NOTICE that on February 26, 2020 at 10:00 AM or as soon  
4 thereafter as the matter may be heard, before the Honorable Karen L. Stevenson of  
5 the United States District Court for the Central District of California, Roybal Federal  
6 Building and Courthouse, 255 E. Temple St., Courtroom 580, Los Angeles, CA  
7 90012, Plaintiff DISH Network L.L.C. ("DISH") will, and hereby does, move this  
8 Court pursuant to Federal Rule of Civil Procedure 34, 37, and Local Rule 37, for an  
9 order compelling Defendant Jadoo TV, Inc. ("JadooTV") to produce documents  
10 responsive to DISH's requests for production served on February 7, 2019 and April  
11 10, 2019 (the "Requests").

12 This Motion follows more than ten hours of telephone conferences between  
13 the parties, two pre-motion conferences with the Court, and several hearings and meet  
14 and confers pursuant to the direction of the bankruptcy judge presiding over  
15 JadooTV's bankruptcy case, wherein JadooTV agreed to produce certain documents  
16 in response to DISH's Requests, failed to produce those documents, and failed to  
17 supplement its written responses. DISH's Motion was originally filed on May 24,  
18 2019 (Dkt. 75). However, JadooTV filed a Chapter 11 bankruptcy petition on May  
19 31, 2019 staying the motion to compel as to JadooTV. (*See* Dkts. 78, 96 at 1-2.) The  
20 bankruptcy court lifted the automatic stay as to JadooTV on January 14, 2020. DISH  
21 now files this Motion to compel JadooTV to produce the documents sought in DISH's  
22 prior motion to compel (Dkt. 75).

23 DISH'S Motion is based on the arguments set forth by DISH in the attached  
24 L.R. 37-2 Joint Stipulation Re: DISH's Motion to Compel Jadoo TV, Inc.'s  
25 Production of Documents and the concurrently filed declaration of Stephen M.  
26 Ferguson.

27 For the reasons set forth in the L.R. 37-2 Joint Stipulation, DISH respectfully  
28 requests that the Court order JadooTV to produce all documents concerning the use,

design, structure, and operation of eMedia from January 2014 to present (Requests 71 and 73), and all documents that JadooTV agreed to produce in response to Requests 1-3, 6-7, 14-21, 23-28, 32, 34-41, 44-46, 48, 50-53, 55, 57-65, 68-70, 71-81, 83, 85-86, 89-103, 105, and 111-112, within seven days of the Court's Order. DISH also requests that the Court order JadooTV to produce all such responsive documents from Defendant Shah's JadooTV email account, the 34 other custodians with JadooTV email accounts, and the three custodians in which JadooTV produced some documents. DISH also requests that the Court order JadooTV to provide supplemental written responses to these Requests stating whether JadooTV has produced all documents, any limitations to JadooTV's production, or that there are no responsive documents in JadooTV's possession, custody, or control. DISH further requests that the Court order JadooTV to pay DISH's attorneys' fees and costs related to this Motion.

Dated: January 25, 2020

Respectfully submitted,

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